

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

RYSTA LEONA SUSMAN, both
individually and as Legal Guardian of
SHANE ALLEN LOVELAND, et al.,

Plaintiffs,

V.

THE GOODYEAR TIRE & RUBBER
COMPANY,

Defendant.

Case No. 8:18-cv-00127

**THE GOODYEAR TIRE & RUBBER COMPANY'S OBJECTIONS TO PLAINTIFFS'
DEPOSITION DESIGNATIONS AND COUNTER-DESIGNATIONS**

The Goodyear Tire & Rubber Company (“Goodyear”) objects to plaintiffs’ deposition designations in their entirety as not relevant to the issues of whether the LT235/85R16 Wrangler HT Load Range E tire at issue was defective in design or manufacture, or to whether Goodyear was negligent in the design or manufacture of the Tire at Issue. The depositions of former employees of Goodyear, Richard J. Olsen, Beale A. Robinson, Ray Young, and Joseph Zekoski were taken of these witnesses in their individual capacity and not as a corporate representative. The scope of the witnesses’ testimony relates solely to the subject matters, scope and documents associated with Goodyear’s investigation into the Load Range E “tread throw” issue initiated in 1995, after the Tire at Issue was manufactured. The testimony designated by plaintiffs from these depositions is not relevant and does not tend to prove the Tire at Issue was defective in design or manufacture, or that Goodyear was negligent in design or manufacture of the Tire at Issue. Goodyear objects to the testimony of each witness in its entirety under FRE 402, FRE 403, and for the reasons set forth in Goodyear’s Motion in Limine ECF 161 and Motion in Limine ECF 171.

Rather than restate these objections to each page and line designation, Goodyear's reference to "General Objections" is intended to assert each of these objections to that testimony.

Objections other than FRE 402, FRE 403, ECF 161 and ECF 171 are separately stated.

The objections are abbreviated pursuant to the legend in footnote 1 below:¹

1. Jay K. Lawrence, November 5, 2019, *Rysta Leona Susman, et al. v. The Goodyear Tire & Rubber Company*, (no Bates number).

Plaintiffs' Designation	Goodyear's Objections	Court's Ruling
5:10-5:12		
8:8-8:17		
9:20-9:22		
10:10-11:4		
11:18-12:5		
17:5-17:22	General objections; MIL No. 165; MIL 172	
19:21-20:23	General objections; MIL No. 165; MIL No. 172	
24:3-24:19		
24:21-24:25	Form objection	
26:22-26:24		

¹ **OBJECTIONS**

R: Relevancy

H: Hearsay

A: Authenticity

O: Other (specify)

F: Foundation

FRE: Federal Rule of Evidence

FRCP: Federal Rule of Civil Procedure

MIL: Goodyear's Motion in Limine

MIL No. 161: Re post-manufacture design changes to Subject Tire

MIL No. 164: Re Dr. Lichtblau opinion on medical treatment Mr. Loveland will likely not need in the future

MIL No. 165: Re other tires, models, or designs

MIL No. 168: Re plant practices at Goodyear's Gadsden, Alabama facility

MIL No. 170: Re redaction of confidentiality legends prior to publishing to jury

MIL No. 171: Re investigation into "tread throws" involving Load Range E tires

MIL No. 172: Re other accidents, claims, or lawsuits

MIL No. 173: Re private recall

MIL No. 174: Re National Highway Traffic Safety Administration's Preliminary Evaluation of Load Range E tires and Goodyear's Voluntary Replacement Program

MIL No. 175: Re Bridgestone/Firestone recall and incidents

MIL No. 176: Re adjustment data

MIL No. 178: Re "Day in the Life Video of Shane Loveland"

MIL No. 179: Re sealing trade secret material or commercially sensitive documents

Plaintiffs' Designation	Goodyear's Objections	Court's Ruling
27:17-28:14		
28:23-29:17		
36:4-36:9		
37:1-37:12	General objections	
38:1-38:3		
40:1-41:5	General objections; MIL No. 172 and MIL 176 as to lines 1-6	
45:3-47:14	General objections; MIL No. 172; MIL No. 176 as to 45:13-47:14	
48:12-49:25	General objections; MIL No. 172; MIL No. 176	
50:7-52:11	General objections; MIL No. 172; MIL No. 176	
52:19-52:23	General objections; MIL No. 172; MIL No. 176	
53:16-55:3	General objections; MIL No. 172; MIL No. 176	
55:11-55:15	General objections	
56:13-58:16	General objections	
60:1-60:21	General objections	
65:9-66:10	General objections; MIL No. 176	
72:19-73:13	General objections; MIL No. 173; MIL No. 174	
73:23-74:16	General objections; MIL No. 173; MIL No. 174	
75:17-77:11	General objections; MIL No. 172; MIL No. 173; MIL No. 174	
84:20-85:13	General objections; MIL No. 173; MIL No. 174	
86:6-87:19	General objections; MIL No. 172; MIL No. 173; MIL No. 174	
94:21-95:25	General objections; MIL No. 173; MIL No. 174	
102:19-109:20	General objections; MIL No. 173; MIL No. 174	
110:23-117:12	General objections; MIL No. 173; MIL No. 174; form and foundation objection 112:6-112:18; MIL No. 172 as to 113:9-114:25; MIL No. 176 as to 115:1-117:12	
118:12-119:1	General objections; MIL No. 172	
119:22-121:25	General objections; MIL No. 172; MIL No. 176	

Goodyear Counter-Designations	Plaintiff's Objections	Court's Ruling
136:10-147:7		

2. Richard J. Olsen, July 17, 2002, *James Aufiero v. The Goodyear Tire & Rubber Company, et al.*; *Linzer v. The Goodyear Tire & Rubber Company, et al.*; *Larry Swanson v. The Goodyear Tire & Rubber Company, et al.*; *Kennette Haymes v. The Goodyear Tire & Rubber Company, et al.*; *Ramona Dow, et al. v. The Goodyear Tire & Rubber Company*; and *Roque Arrendondo v. The Goodyear Tire & Rubber Company, et al.*, GY_Susman_11429.

Plaintiffs' Designation	Goodyear Objections	Court's Ruling
21:2-21:11		
23:9-23:12		
28:13-29:14		
47:21-48:03, 06		
48:8-48:12		
48:16:49:03	General objections; MIL No. 176	
52:21-54:12	General objections; MIL No. 176	
60:12-60:24	General objections; MIL No. 176	
62:16-63:03	General objections; MIL No. 176	
66:4-66:17	General objections; MIL No. 176	
80:23-81:13, 17-21	General objections; R:F as to 80:23-81:3	
84:2-84:24	General objections; MIL No. 172	
85:16-85:23	General objections; MIL No. 172	
90:1-91:7	General objections; R; F; H; MIL No. 172	
93:4-94:9	General objections; R; F; H; MIL No. 172	
96:15-96:20	General objections; MIL No. 176	
98:11-98:20	General objections; MIL No. 172	

Plaintiffs' Designation	Goodyear Objections	Court's Ruling
107:8-107:21	General objections; MIL No. 172	
133:15-17, 20-21		
150:13-152:04	General objections; MIL No. 172; R; F	
154:03-19	General objections; MIL No. 172; R; F	
204:14-204:16	General objections; MIL No. 172; Mil No. 176	
206:6-207:1	General objections; MIL No. 172; Mil No. 176	
228:18-229:9	General objections; MIL No. 172; Mil No. 176	
229:24-230:4	General objections; MIL No. 172; Mil No. 176	
233:13-233:20	General objections	
256:4-257:8	General objections; MIL No. 176	
258:12-259:2	General objections; MIL No. 172; MIL No. 176	
261:1-261:18	General objections; MIL No. 172; MIL No. 176	
261:23-263:9		
269:4-269:17	General objections; R; F; MIL No. 172	
276:5-276:14	General objections; MIL No. 161	
278:7-279:12	General objections; MIL No. 172; MIL No. 176; F (Olsen was not responsible for forming the team)	
282:14-17	General objections; R; F; MIL No. 172; MIL No. 174	
282:20-283:2, 5-25	General objections; R; F; MIL No. 172; MIL No. 174	
284:3-7	General objections; R; F; MIL No. 172; MIL No. 174	
284:18-286:7	General objections; R; F; non-disclosed opinion; form of question	
291:17-292:5	General objections; MIL No. 168; See ECF No. 224 where plaintiffs stipulate they will not offer irrelevant and immaterial evidence regarding Gadsden plant practices	
294:6-294:15	General objections; MIL No. 168; R; F; H; see ECF No. 224	
295:23-296:5	General objections; MIL No. 168; R; F; H; see ECF No. 224	

Goodyear Counter-Designations	Plaintiff's Objections	Court's Ruling
26:5-28:12		
65:21-66:3		
81:23-83:2		
96:21-97:15		
255:7-256:3		
259:4-259:7		
286:8-286:21		

3. Beale A. Robinson, August 3, 2000, *Lori Frankl, et al. v. Goodyear Tire and Rubber Company, et al.*, Volume 1, GY_Susman_08726.

Plaintiffs' Designation	Goodyear's Objections	Court's Ruling
8:10:15:49-10:10:19:17	General objections; MIL No. 165	
10:10:Q9:50-18:10:A1:52	General objections; R objection to any design changes not related to plaintiffs' defect theories; MIL No. 172; MIL No. 176	
19:10:Q3:27-19:10:A3:38	General objections; MIL No. 176	
22:10:Q6:07-22:10:36:29	General objections; MIL No. 176	
23:10:A6:47-23:10:A7:29	General objections; MIL No. 176	
24:10:Q8:17-28:10:A5:19	General objections; MIL No. 168; See ECF No. 224 where plaintiffs agree to not present irrelevant evidence regarding Gadsden plant practices unrelated to defect theories	
35:10:Q3:53-37:10:58:06	General objections; MIL No. 168; See ECF No. 224 where plaintiffs agree to not present irrelevant evidence regarding Gadsden plant practices unrelated to defect theories	
39:11:Q1:01-42:11:A4:42	General objections	
53:11:Q1:25-	General objections; MIL No. 168; See ECF No. 224 where	

Plaintiffs' Designation	Goodyear's Objections	Court's Ruling
54:11:A2:12	plaintiffs agree to not present irrelevant evidence regarding Gadsden plant practices unrelated to defect theories	
54:11:42:54-55:11:44:10	General objections	
58:11:Q7:44-59:11:49:04	General objections; MIL No. 168; See ECF No. 224 where plaintiffs agree to not present irrelevant evidence regarding Gadsden plant practices unrelated to defect theories	
59:11:A9:15-60:11:49:45	General objections; MIL No. 168; See ECF No. 224 where plaintiffs agree to not present irrelevant evidence regarding Gadsden plant practices unrelated to defect theories	
62:11:A2:17-62:11:52:48	General objections; MIL No. 168; See ECF No. 224 where plaintiffs agree to not present irrelevant evidence regarding Gadsden plant practices unrelated to defect theories	
66:11:Q8:29-66:11:59:33	General objections	
67:12:Q0:37-68:12:01:52	General objections	
68:12:Q2:08-72:12:08:42	General objections; MIL No. 172; MIL No. 176	
86:13:Q4:27-87:13:A5:42	General objections	
88:13:Q6:40-90:13:30:19	General objections; FRE 602	
93:13:Q4:41-96:13:A8:49	General objections; MIL No. 161 as to 13:Q4:41-13:34:43	
99:13:Q3:42-100:13:A5:37	General objections; R; F; FRE 602	
121:14:27:47-125:14:A4:58	General objections; R; F; FRE 602; MIL No. 165; MIL No. 172; MIL No. 176	

Goodyear Counter-Designations	Plaintiff's Objections	Court's Ruling
42:11:04:43-42:11:05:21		

4. Beale A. Robinson, August 4, 2000, *Lori Frankl, et al. v. Goodyear Tire and Rubber Company, et al.*, Volume 2, GY_Susman_08854.

Plaintiffs' Designation	Goodyear's Objections	Court's Ruling
132:09:13:05-134:09:A6:48	General objections	
141:09:26:46-142:09:28:32	General objections; MIL No. 176	
145:09:Q1:31-145:09:A1:46	General objections; MIL No. 165	
147:09:36:07-148:09:36:28	General objections; MIL No. 165	
154:09:Q3:09-154:09:43:18	General objections; R; MIL No. 165	
154:09:Q3:34-156:09:A6:32	General objections; R; MIL No. 165	
156:09:Q6:46-157:09:56:53	General objections; R; MIL No. 165	
157:09:Q7:57-157:09:58:52	General objections; R; MIL No. 165	
158:09:A8:59-158:10:00:07	General objections; R; MIL No. 165	
159:10:Q1:39-160:10:02:11	General objections; R; MIL No. 165	
161:10:Q4:22-162:10:04:54		
162:10:Q8:15-165:10:A2:43	General objections; MIL No. 172; MIL No. 176	
176:10:Q3:14-177:10:A3:59	General objections	
179:10:Q7:30-179:10:37:54	General objections	
186:10:Q8:04-186:10:48:29	General objections; MIL No. 176	

Plaintiffs' Designation	Goodyear's Objections	Court's Ruling
189:10:Q4:25-190:10:56:31	General objections; MIL No. 176	
199:11:Q9:32-199:11:20:06	General objections; MIL No. 176	
199:11:A1:31-200:11:23:03	General objections; MIL No. 176; designation cuts off witness in mid-answer	
213:11:Q4:15-213:11:45:08	General objections	
215:11:47:46-216:11:48:33	General objections	
246:12:Q7:32-246:12:48:12	General objections	
248:12:Q2:31-248:12:A3:03	General objections; MIL No. 172; MIL No. 176	
250:12:Q5:58-251:12:56:52	General objections; MIL No. 172; MIL No. 176; FRE 602; F; H; (see 251:12:Q6:56 where witness testified he does not know who authored these conclusions)	
252:12:Q8:19-253:13:A1:08	General objections	

Goodyear Counter-Designations	Plaintiff's Objections	Court's Ruling
148:9:Q6:32-148:9:A7:18		
201:11:23:06-201:11:A3:35		
216:11:Q8:38-217:11:50:22		
289:14:01:37-289:14:02:54		

5. Beale Robinson, December 4, 2001, *Garcia v. Kelly-Springfield Tire Company, et al.*; *Phyllis Geer, et al. v. The Kelly-Springfield Tire Company, Inc., et al.*, Volume 1, GY_Susman_09030.

Plaintiffs' Designation	Goodyear's Objections	Court's Ruling
6		
47-48	General objections	
51-53	General objections	
55	General objections; R; MIL No. 165	
57	General objections; R; MIL No. 165	
60-61		
61		
64-65		
74	General objections; R; MIL No. 172	
78	General objections; MIL No. 172; MIL No. 176	
80-81	General objections; MIL No. 176	
82-83	General objections; MIL No. 172; MIL No. 176	
84-86	General objections; MIL No. 172; MIL No. 176	
89	General objections; MIL No. 172; MIL No. 176	
89-92	General objections; MIL No. 172; MIL No. 176	
93	General objections	
108		
109-111	General objections	
111-115	General objections; MIL No. 172; MIL No. 176	
129-130	General objections; F (witnesses' first involvement with light truck tires was not until 1996 – see 24:20)	
131-132	General objections; omits witnesses' answer at 132:25-133:22	
139-140	General objections; MIL No. 161	
151	General objections; MIL No. 168; see plaintiffs' agreement regarding evidence on Gadsden plant practices ECF No. 224	

Plaintiffs' Designation	Goodyear's Objections	Court's Ruling
183-184	General objections; MIL No. 172	
201-204	General objections; R; FRE 403	

Goodyear Counter-Designations	Plaintiff's Objections	Court's Ruling
86:6-86:12		
89:11-89:17		
92:15-93:11		
132:25-133:22		

6. Beale Robinson, December 5, 2001, *Garcia v. Kelly-Springfield Tire Company, et al.*; *Phyllis Geer, et al. v. The Kelly-Springfield Tire Company, Inc., et al.*, Volume 2, GY_Susman_09249.

Plaintiffs' Designation	Goodyear's Objections	Court's Ruling
239-240	General objections; MIL No. 172; MIL No. 176	
241-243	General objections; MIL No. 172; MIL No. 176	
255-256	General objections; MIL No. 172; MIL No. 176	
272-273	General objections; MIL No. 173	
275-276	General objections; MIL No. 173	
277-278	General objections; MIL No. 173	
279-280	General objections; MIL No. 173	
287-288	General objections; MIL No. 172; MIL No. 176	
289-290	General objections; MIL No. 172; MIL No. 176	
298		
307		

7. Ray Young, September 19, 2002, *Arrendondo v. The Goodyear Tire & Rubber Co., et al.*; *Boerm v. The Kelly-Springfield Tire Co., et al.*, GY_Susman_13270.

Goodyear objects to any testimony designed to be presented from Mr. Young for the additional reason that his employment with Goodyear was as a compounder (11:24-12:1) and there are no claims in this case that the tire was defective due to the compounds used; and because Mr. Young's involvement in the LRE investigation was only as a member of the first committee in 1995, was not involved in any committee thereafter (15:7-15:23) and he had nothing to do with preparing any of the presentations on the issues (16:9-16:19); and because Mr. Young had nothing to do with the decision to apply the nylon overlay to the Wrangler HT tire (50:6-50:14).

Plaintiffs' Designation	Goodyear Objections	Court Ruling
4:7-4:8		
11:24-12:1		
15:7-15:21	General objections	
17:9-17:11	General objections	
17:15-17:19	General objections	
17:23-18:6	General objections	
22:12-22:21	General objections; MIL No. 172	
22:23-23:2	General objections	
23:22-24:4	General objections	
26:19-27:14	General objections; MIL No. 172; MIL No. 176	
28:6-29:5	General objections; MIL No. 161; MIL No. 172; MIL No. 176	
29:24-30:2	General objections; MIL No. 172; MIL NO. 176	
44:20-44:25	General objections; MIL No. 161; MIL No. 172; MIL No. 176	
45:7-46:24	General objections; MIL No. 161; MIL No. 172; MIL No. 176	
49:18-53:13	General objections; MIL No. 161; MIL No. 172; MIL No. 176	

Plaintiffs' Designation	Goodyear Objections	Court Ruling
63:7-64:18	General objections; MIL No. 172; MIL No. 176; see attorney objections	
93:6-93:20	General objections; MIL No. 172; MIL No. 176; F	
94:12-94:17	General objections; MIL No. 172; MIL No. 176; F	
95:10-95:17	General objections; MIL No. 172; MIL No. 176; F	
96:5-96:6	General objections; MIL No. 172; MIL No. 176; F	

8. Joseph Zekoski, October 17, 2001, *Ebanks v. The Kelly-Springfield Tire Company, et al.*; GY_Susman_10540.

Plaintiffs' Designation	Goodyear's Objections	Court's Ruling
5		
5-6		
9		
13	General objections	
14-16	General objections	
16-17	General objections	
17	General objections	
19-20	General objections; MIL No. 172; MIL No. 165	
21	General objections; MIL No. 165	
22	General objections; MIL No. 165	
23-25	General objections; MIL No. 176; MIL No. 172	
26-28	General objections; MIL No. 176; MIL No. 172	
28-30	General objections; MIL No. 176; MIL No. 172	
30	General objections	
31	General objections	
32-34	General objections	
35	General objections; MIL No. 165	
37-38	General objections; R – changes to tires other than adding nylon overlay have nothing to do with plaintiffs' defect	

Plaintiffs' Designation	Goodyear's Objections	Court's Ruling
	theories	
39-41	General objections; R – changes to tires other than adding nylon overlay have nothing to do with plaintiffs' defect theories; MIL No. 165	
42	General objections; R – changes to tires other than adding nylon overlay have nothing to do with plaintiffs' defect theories; MIL No. 165	
43-45	General objections	
46	General objections; R – changes to tires other than adding nylon overlay have nothing to do with plaintiffs' defect theories; MIL No. 165	
48	General objections; MIL No. 172	
49-50	General objections; MIL No. 172; MIL No. 176; MIL No. 165	
51-53	General objections; MIL No. 165	
54-55	General objections	
57	General objections	
58-59	General objections; R – changes to tires other than adding nylon overlay have nothing to do with plaintiffs' defect theories	
66-69	General objections; R – changes to tires other than adding nylon overlay have nothing to do with plaintiffs' defect theories	
72-73	General objections; MIL No. 172	
74-75	General objections; MIL No. 172; MIL No. 176; R – design and manufacture changes unrelated to defect theories	
75	General objections	
77	General objections	
78-82	General objections; MIL No. 172; MIL No. 176; MIL No. 165	
84-85	General objections; MIL No. 172; MIL No. 176; MIL No. 165	
85	General objections; MIL No. 172; MIL No. 176; MIL No. 165	
86-87	General objections; MIL No. 165; R – changes to design	

Plaintiffs' Designation	Goodyear's Objections	Court's Ruling
	and manufacture unrelated to plaintiffs' defect theories	
90	General objections; MIL No. 165; R – changes to design and manufacture unrelated to plaintiffs' defect theories	
92-93	General objections; MIL No. 172; MIL No. 165	
94-96	General objections; MIL No. 172; MIL No. 165; MIL No. 176	
96-97	General objections	
97	General objections	
98	General objections	
102-103	General objections	
106-109	General objections; MIL No. 172; MIL No. 176; MIL No. 165; R – design and manufacture changes unrelated to plaintiffs' defect theories	
110-114	General objections; MIL No. 172; MIL No. 176; MIL No. 165	
114-118	General objections; MIL No. 172; MIL No. 176; MIL No. 165; F; FRE 602 (chart); H	
125-131	General objections; MIL No. 172; MIL No. 176; MIL No. 165; F; FRE 602 (chart); H	
132-135	General objections; MIL No. 172; MIL No. 176; MIL No. 165; MIL No. 161; R – design and manufacture changes unrelated to plaintiffs' defect theories	
136-137	General objections; MIL No. 165	
138	General objections; MIL No. 172; MIL No. 165	
139-140	General objections; MIL No. 172; MIL No. 165	
140-141	General objections; MIL No. 172; MIL No. 165; R; FRE 403 regarding evidence of any settlements	
143	General objections; MIL No. 172; F; FRE 602	
151-152	General objections; MIL No. 172; R – testimony relates to use of an overlay on passenger tires not radial light truck tires; MIL No. 165	
154-157	General objections; MIL No. 165; MIL No. 172; MIL No. 176; MIL No. 161	
161-163	General objections	

Plaintiffs' Designation	Goodyear's Objections	Court's Ruling
171-172	General objections; R; MIL No. 165	
172-174	General objections; R; MIL No. 165; MIL No. 172	
174-175	General objections; R; MIL No. 165; MIL No. 172	
178	General objections; form and foundation	

Goodyear Counter-Designations	Plaintiff's Objections	Court's Ruling
191:7-192:22		

GREENSFELDER, HEMKER & GALE, P.C.

By: /s/ Edward S. Bott, Jr.

Edward S. Bott, Jr.

Clark W. Hedger

Juliane M. Rodriguez

10 South Broadway, Suite 2000

St. Louis, MO 63102

(314) 241-9090

Fax: (314) 345-5465

esb@greensfelder.com

ch1@greensfelder.com

jrodriguez@greensfelder.com

AND

BAIRD HOLM LLP

Jennifer D. Tricker (NE# 23022)

1700 Farnam Street, Suite 1500

Omaha, NE 68102-2068

(402) 344-0500

jtricker@bairdholm.com

Attorneys for The Goodyear Tire & Rubber Company

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing was sent via email this 28th day of February, 2020.

Kyle W. Farrar
KASTER, LYNCH, FARRAR & BALL, LLP
1010 Lamar, Suite 1600
Houston, TX 77002
kyle@fbtrial.com

Paul E. Godlewski
SCHWEBEL, GOETZ & SIEBEN, P.A.
80 South 8th Center
5120 IDS Center
Minneapolis, MN 54402
pgodlewski@schwebel.com

Michael F. Coyle
FRASER, STRYKER LAW FIRM
409 South 17th Street
Suite 500, Energy Plaza
Omaha, NE 68102
mcoyle@fraserstryker.com

Attorneys for Plaintiffs

/s/ Edward S. Bott, Jr.

Plaintiffs' Designation	Goodyear's Objections	Court's Ruling
9:10-16:25	Goodyear objects to Exhibit 1 and all testimony relating to it as cumulative, lack of foundation, MIL No. 176; MIL No. 172; MIL No. 165; hearsay; and the Court's Order ECF No. 263, Sec. I.B, and exhibit not identified on plaintiffs' Exhibit List.	
21:4-29:1	Goodyear objects to Exhibit 2 and all testimony relating to it as cumulative, lack of foundation, MIL No. 176; MIL No. 172; MIL No. 165; hearsay; and the Court's Order ECF No. 263, Sec. I.B, and exhibit not identified on plaintiffs' Exhibit List.	
29:5-31:22	Goodyear objects to Exhibits 3 and 4 and all testimony relating to it as cumulative, lack of foundation, MIL No. 176; MIL No. 172; MIL No. 165; hearsay; and the Court's Order ECF No. 263, Sec. I.B, and exhibit not identified on plaintiffs' Exhibit List.	
31:25-42:25	Goodyear objects to Exhibit 13 and all testimony relating to it as cumulative, lack of foundation, MIL No. 176; MIL No. 172; MIL No. 165; hearsay; and the Court's Order ECF No. 263, Sec. I.B, and exhibit not identified on plaintiffs' Exhibit List.	
43:13-49:17	Goodyear objects to Exhibit 6 and all testimony relating to it; violates MIL Order ECF No. 263, Sec. I.G. Gadsden plant practices; MIL No. 165; F,H, FRE 403, and exhibit not identified on plaintiffs' Exhibit List.	
51:14-57:24	Goodyear objects to Exhibit 14 and testimony relating to it on the basis of lack of foundation, cumulative, and exhibit not identified on plaintiffs' Exhibit List.	
60:5-60:12	R, F, cumulative.	
60:22-63:3	Goodyear objects to Exhibit 7 and all testimony relating to it; the basis of F, H, irrelevant defect theories, FRE 403, and exhibit not identified on plaintiffs' Exhibit List.	
64:14-64:23	Goodyear objects to Exhibit 8 and all testimony relating to it on the basis it violates ECF No. 263 Sec. I.G.; witness lacks foundation (see 65:1-65:3), and exhibit not identified on plaintiffs' Exhibit List.	
67:2-68:24	Goodyear objects to Exhibit 8 and all testimony relating to it on the basis of MIL No. 176, MIL No. 172, MIL No. 168 and MIL Order ECF No. 263, Sec. I.B., and MIL No. 165, and exhibit not identified on plaintiffs' Exhibit List.	

Plaintiffs' Designation	Goodyear's Objections	Court's Ruling
69:9-70:25	Goodyear objects to Exhibit 9 and all testimony relating to it on the basis of MIL No. 168 and MIL Order ECF No. 263, Sec. I.G.; irrelevant defect theory; FRE 403; F (see 71:2-71:6).	
99:20-101:12	F, non-disclosed opinion, MIL No. 161.	
102:10-103:7	Goodyear objects to Exhibit 10 and all testimony relating to it on the basis of F, MIL No. 161, and exhibit not identified on plaintiffs' Exhibit List.	
121:12-121:14	MIL No. 165, F, R.	
129:16-132:6	Goodyear objects to Exhibit 13 and all testimony relating to it on the basis of F, H, and MIL No. 161, and exhibit not identified on plaintiffs' Exhibit List.	

Subject to the above stated objections, Goodyear identifies the following counter-designations:

Goodyear's Counter-Designations	Plaintiffs' Objections	Court's Ruling
65:1-65:3		
71:2-71:6		
101:13-101:18		
103:9-103:16		

GREENSFELDER, HEMKER & GALE, P.C.

By: /s/ Edward S. Bott, Jr.

Edward S. Bott, Jr.

Clark W. Hedger

Robert L. Duckels

10 South Broadway, Suite 2000

St. Louis, MO 63102

(314) 241-9090

Fax: (314) 345-5465

esb@greensfelder.com

ch1@greensfelder.com

rld@greensfelder.com

AND

BAIRD HOLM LLP
Jennifer D. Tricker (NE# 23022)
1700 Farnam Street, Suite 1500
Omaha, NE 68102-2068
(402) 344-0500
jtricker@bairdholm.com

Attorneys for The Goodyear Tire & Rubber Company

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing was emailed this 10th day of March, 2020 to:

Kyle W. Farrar
KASTER, LYNCH, FARRAR & BALL, LLP
1010 Lamar, Suite 1600
Houston, TX 77002
kyle@fbtrial.com

Paul E. Godlewski
SCHWEBEL, GOETZ & SIEBEN, P.A.
80 South 8th Center
5120 IDS Center
Minneapolis, MN 54402
pgodlewski@schwebel.com

Michael F. Coyle
FRASER, STRYKER LAW FIRM
409 South 17th Street
Suite 500, Energy Plaza
Omaha, NE 68102
mcoyle@fraserstryker.com

Attorneys for Plaintiffs

/s/ Edward S. Bott, Jr.